



July 20th, 2021

Trajectory Energy Partners, LLC
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Re: 2021 LTRRPP Update – Request for Comments #2 – Illinois Solar for All

Trajectory Energy Partners (“Trajectory”) appreciates the opportunity to respond to the request for comments on the Long-Term Renewable Resources Procurement Plan Update. Specifically, we have comments on the Illinois Solar for All portion of Workshop #2, both on items for which comments were requested and also items not covered.

Comments on topics not covered:

Project Viability

As noted in Workshop 2, of all of the Low-Income Community Solar project selected in Program Years 1-3, only the two smallest projects have been energized. It is increasingly important in future program years that steps are taken to ensure project viability at the time of application. To this end, Trajectory has one specific suggested change to the Approved Vendor Manual on project submission around interconnection:

The current ILSFA Approved Vendor Manual states:

Section 8.4 Part 1 Project Approval (*page 78*)

- For projects larger than 25 kW
 - Interconnection agreement signed by both the interconnecting utility and the interconnecting customer. (Exceptions will be made for projects that were forced from the utility interconnection queue due to the utility’s queue management process. These projects need only demonstrate that they exited the interconnection queue involuntarily and have subsequently reapplied for interconnection.)

This section should be changed to:

- For projects larger than 25 kW
 - Interconnection agreement signed by both the interconnecting utility and the interconnecting customer. The Interconnection agreement must be currently valid and not have been forced from the utility interconnection queue due to the utility’s queue management process.

The requirement for an interconnection agreement is to show project readiness. The exception allowing projects to reapply for interconnection after being forced from the queue made sense in the early years of the program, but it no longer does. An interconnection agreement issued in 2018 or 2019 is no reflection of the current status of a given utility circuit as other projects may have subsequently been interconnected to a circuit, utility upgrades may have changed a circuit, or other changes that would make an additional project unviable on a given circuit may have occurred. Under the current Approved Vendor manual, a developer could submit an Interconnection Request the day before submitting an ILSFA project application along with a former Interconnection Agreement that could be 4 years old or older, and it would be considered a valid submission. It would not be for many months later, after the project selection process, that the developer would get the updated interconnection cost estimates showing that the site might not be viable.

As ILSFA enters program year 4, having a current valid interconnection agreement should be a requirement for project submission. An additional note of caution is that Interconnection Agreements with a utility do not typically show an “expiration date”. For at least the low-income community solar project sub-category, the ILSFA Program Administrator should confirm the validity of Interconnection Agreements with the utility.

The LTRRPP Update should direct the ILSFA Program Administrator to only allow projects over 25kW with a viable interconnection agreement to be submitted, and to confirm the validity of interconnection agreements with the utility.

Responses to specific questions:

Slides 26/27 – Low-Income Community Solar Sub-Program

5. What challenges have initially been observed related to recruitment of low-income subscribers?

Trajectory has actively been involved in the education and recruitment of subscribers on low-income community solar projects in both Ameren and ComEd territory. Trajectory has served as a designee for projects in Ameren, and as the initial developer of the Rockford Solar project spent considerable time developing an outreach plan for subscription education in Rockford. Trajectory suggests that the LTRRPP update directs the ILSFA program administrator to undergo a stakeholder process to evaluate the current disclosure form and income verification forms and identify specific ways to streamline the process. While Trajectory and other stakeholders have specific ideas, this is a complicated topic and an in-depth stakeholder process would be the best way to update the current system.

6. Have you observed market confusion with community solar projects participating in the Adjustable Block Program? If so, how?

Trajectory has not observed any problematic confusion with community solar projects participating in the Adjustable Block Program. In general, the more awareness there is of community solar overall, the better. By working with trusted local organizations, it is possible to

make sure income-eligible residents understand that the ILSFA projects are the best option for them.

7. *What changes in approach, if any, should the program consider making to encourage smaller community solar projects (e.g., under 1MW)?*

No additional changes to the program or project selection criteria should be implemented to encourage smaller projects, for two reasons:

1. Changing the project selection criteria significantly to prioritize smaller project would undermine other priorities such as geographic diversity. Recent changes to the project selection criteria have given priority to geographic diversity, specifically supporting development in Cook County, as well as prioritizing sites owned by non-profit and public sector entities. If the points awarded for small projects are greatly increased, the projects that are incentivized are unlikely to be from urban areas such as Cook County, but instead rural and smaller cities where land development is less complicated.
2. Smaller community solar projects are impractical and there are unlikely to ever be many submissions. Interconnection is one of the key reasons that smaller community solar projects are very impractical. Projects have two options to interconnect as a community solar project:
 - a. Direct Connection to a circuit – Most projects directly connect to an existing utility circuit, and the prices for these interconnections are the same whether the project is 200kW or 2MW. In ComEd these interconnections typically cost over \$500,000, which is impractical for anything much below 2MW. In Ameren these interconnections typically cost \$120,000, which make anything less than 1MW impractical.
 - b. Behind the Meter interconnection – A smaller community solar project can also be interconnected utilizing an existing utility meter at a building or other facility. This is theoretically much cheaper, but in practice it is very rarely an option. Connecting the community solar project behind a given meter means that that facility is giving up the option for a behind the meter system supporting their electricity costs, which has a higher net-metering credit value. Additionally, it is very rare for a given facility to be willing to lease its roof for a long-term agreement for the low rental values associated with community solar.

Finally, the overall challenges smaller community solar projects have faced that have led to such low submission rates in the first 3 program years, will be greatly increased in future years as the Smart Inverter Capacity Rebate winds down. Without these incentives, smaller projects will have an even more difficult time ever being practical.

8. *Is the model of 100% low-income subscriber owned community solar projects viable? If so, what adjustments could be made to increase applications from such projects.*

100% subscriber owned community solar projects are not practically viable. Trajectory appreciates that the law specifically targets 100% subscriber owned projects and does not give the program administrator flexibility to lower this percentage. Given this fact, the program should not spend significant time or resources on this goal.

Slide 28: Additional Sub-Programs

Trajectory notes that the IPA made no mention of the Low-Income Community Solar Pilot sub-program in its presentation. While draft legislation called for the elimination of this sub-program, if no legislation has passed by the time of the issuance of the draft LTRRPP update in August, it would be important for the IPA to outline its intentions for any future procurements through this subprogram.

Slide 29: Project Selection Process

10. What additional measures could potentially be included in project selection to encourage participation by MWBE Approved Vendors, non-approved Vendor contractors and subcontractors, and other MWBE entities?

The project selection criteria updates implemented for Program Year 3 that awarded points for MWBE subcontractor commitments were a thoughtful and impactful addition to the program. As an Approved Vendor who has made these commitments on projects that were selected in the program, Trajectory has extensive experience with this program. The most straightforward way to ensure a higher percentage of selected projects have these commitments is to increase the points awarded for this category in the project selection protocol, so that in practice, only a project that makes these commitments is likely to be selected.

The detailed requirements that accompanied the program ensure that the commitment is real and meaningful. In addition, the opportunity for MWBE subcontractors to partner with an existing Approved Vendor create a mentorship opportunity for new MWBE companies to grow in the market. Trajectory has spent considerable time with the MWBE partner we work with, introducing them to the market, the ILSFA program overall, and everything we can to do ensure that our MWBE partner is successful and can deliver on the projects we work together on.

There are two reasons that the program did not have broader uptake in Program Year 3:

1. The final project selection criteria with the requirements for the MWBE points was released on June 12, 2021, which was 35 days before the deadline for Non-Profit/Public Sector project submissions, and less than 3 months before the deadline for the community solar project submissions.
2. Particularly for Community Solar, because of the lax requirements around interconnection agreements in ILSFA noted above in our comments, many submissions in the program are “recycled” projects that are left over from the initial ABP program. Developers often put together last-minute submissions and were not sufficiently engaged to do the hard work of developing a business relationship with an MWBE sub-contractor for the program.

11. The Project Selection Protocol this year includes points for geographic regions. Are there further refinements that could be made to encourage statewide geographic diversity of projects?

The Geographic diversity system for awarded points that was implemented in Program Year 4 should be left in place for the next two program years covered by this LTRRPP.

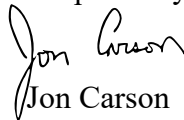
The Project Selection Protocol for Program Year 4 that instituted the new geographic point system was released on March 23, 2021. This was less than 3 months before the application window closed for the Non-Profit/Public Sector sub-program, and less than 6 months before the application window closed for the Community Solar sub-program. Given the time it takes to develop these projects, there was no practical way that any developer could respond to these geographic priorities in that time window.

If the draft LTRRPP document indicates that there are likely to be changes to the geographic diversity component for Program Year 5, developers will once again be left to guess at what the priorities will be before they are finalized.

12. What other criteria should be considered in the Project Selection Protocol Process, and what other policy objectives merit consideration?

Over the course of 4 Program Years, the Project Selection Protocol has evolved into a thoughtful approach that prioritizes projects that meet the key goals of the ILSFA program. However, in all 4 program years to date, the updated document has come out far too late for developers to respond to that year's changes. For this LTRRPP update, the IPA should give the current approach the time necessary to have an impact, and emphasize the prioritization for MWBE involvement, the current geographic diversity criteria, and for Low-Income Community Solar the partnerships with non-profit and public sector critical services providers as site hosts and anchor subscribers.

Respectfully submitted,



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